

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CF 135 FLAT LLC, CF 135 WEST MEMBERS
LLC, and THE CHETRIT GROUP, LLC,

Interpleader Plaintiffs,

-against-

TRIADOU SPV S.A. and CITY OF ALMATY, a
foreign city,

Interpleader Defendants.

No. 15-CV-05345(AJN)

CITY OF ALMATY, KAZAKHSTAN and BTA
BANK JSC,

Crossclaim Plaintiffs,

-against-

MUKHTAR ABLYAZOV, VIKTOR
KHRAPUNOV, ILYAS KHRAPUNOV, and
TRIADOU SPV S.A.,

Crossclaim Defendants.

DECLARATION OF JOHN P. CURLEY

I, JOHN P. CURLEY, hereby declare under penalty of perjury that the following is true and correct:

1. I am an attorney admitted to practice in the State of New York and before this Court, and I am a partner with Hoguet Newman Regal & Kenney LLP, counsel for Crossclaim Defendants Viktor and Ilyas Khrapunov (the “Khrapunovs”) in the above-captioned case.

2. I submit this declaration in support of the Khrapunovs’ motion to dismiss the Crossclaims.

3. Attached hereto as **Exhibit A** is a true and correct copy of the U.S. State Department's 2015 Human Rights Report for Kazakhstan.

Dated: August 17, 2016
New York, New York

/s/ John P. Curley
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*Counsel for Viktor Khrapunov and
Ilyas Khrapunov*